

STATE OF SOUTH CAROLINA

(Caption of Case)  
IN RE:

South Carolina Electric and Gas Company -  
Annual Review of Base Rates for Fuel Costs of South  
Carolina Electric and Gas Company

215833  
BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

COPY

DOCKET

Posted: led

NUMBER: 2009 - 2 - E

Dept: S.A.

Date: 3/20/09

Time: 1:30

(Please type or print)

Submitted by: E. Wade Mullins, III

SC Bar Number: 3525

Address: PO Box 61110  
Columbia, SC 29260

Telephone: 803-252-7693

Fax: 803-254-5719

Other:

Email: wmullins@bprwm.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- ☒ Electric  
☐ Electric/Gas  
☐ Electric/Telecommunications  
☐ Electric/Water  
☐ Electric/Water/Telecom.  
☐ Electric/Water/Sewer  
☐ Gas  
☐ Railroad  
☐ Sewer  
☐ Telecommunications  
☐ Transportation  
☐ Water  
☐ Water/Sewer  
☐ Administrative Matter  
☐ Other:

- ☐ Affidavit  
☐ Agreement  
☐ Answer  
☐ Appellate Review  
☐ Application  
☐ Brief  
☐ Certificate  
☐ Comments  
☐ Complaint  
☐ Consent Order  
☐ Discovery  
☐ Exhibit  
☐ Expedited Consideration  
☐ Interconnection Agreement  
☐ Interconnection Amendment  
☐ Late-Filed Exhibit

- ☐ Letter  
☐ Memorandum  
☐ Motion  
☐ Objection  
☐ Petition  
☐ Petition for Reconsideration  
☐ Petition for Rulemaking  
☐ Petition for Rule to Show Cause  
☐ Petition to Intervene  
☐ Petition to Intervene Out of Time  
☐ Prefiled Testimony  
☐ Promotion  
☐ Proposed Order  
☐ Protest  
☐ Publisher's Affidavit  
☐ Report  
☐ Request  
☐ Request for Certification  
☐ Request for Investigation  
☐ Resale Agreement  
☐ Resale Amendment  
☐ Reservation Letter  
☐ Response  
☐ Response to Discovery  
☐ Return to Petition  
☐ Stipulation  
☐ Subpoena  
☐ Tariff  
☒ Other: Surrebuttal  
Testimony

RETURN TO  
SERVICE

supv. due 3/19/09

OK led

# BRUNER, POWELL, ROBBINS, WALL & MULLINS, LLC

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WARREN C. POWELL, JR., P.A.\* RONALD E.

ROBBINS, P.A.

HENRY P. WALL, P.A.

E. WADE MULLINS, III, P.A.

BRIAN P. ROBINSON, P.A.

WESLEY D. PEEL, P.A.

JOEY R. FLOYD, P.A.

WILLIAM D. BRITT, JR., P.A.

\* Also Admitted in District of Columbia

LEAH EDWARDS GARLAND

March 19, 2009

AUTHOR'S E-MAIL:

[WMULLINS@BRUNERPOWELL.COM](mailto:WMULLINS@BRUNERPOWELL.COM)

## **VIA HAND DELIVERY**

The Honorable Charles L.A. Terreni

Chief Clerk/Administrator

**Public Service Commission of South Carolina**

101 Executive Center Drive

Columbia, South Carolina 29210

RECEIVED  
109 MAR 19 PM 4:01  
SC PUBLIC SERVICE  
COMMISSION

**RE: Annual Review of Base Rates for Fuel Costs of South Carolina Electric & Gas Company; Docket No. 2009-2-E  
Our File No.: 7-1719-104**

Dear Mr. Terreni:

CMC Steel South Carolina ("CMC Steel") is hereby filing with the Public Service Commission of South Carolina ("Commission") twenty-five (25) copies of the Surrebuttal Testimony of its witness Richard Thomas in the above-referenced matter. As part of the Surrebuttal Testimony of Mr. Thomas, CMC Steel is filing both a public and confidential version of the testimony. The confidential version is filed in a separate and sealed envelope.

During the pendency of this matter, CMC Steel requested, and South Carolina Electric & Gas Company ("SCE&G") provided pursuant to the terms of a Confidentiality Agreement ("Agreement"), certain documents which SCE&G asserts are proprietary, commercially and/or competitively sensitive or confidential or in the nature of a trade secret ("Confidential Information"). As part of the Agreement, CMC Steel agreed to safeguard such information so as to prevent disclosure to any unauthorized person(s). Therefore, CMC Steel respectfully requests that the Commission maintain the confidential version of the testimony under seal and protect the same from disclosure.

RECEIVED

MAR 20 2009

PSC SC  
DOCKETING DEPT.

The Honorable Charles L.A. Terreni  
March 19, 2009  
Page 2 of 2

Thank you in advance for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Wade Mullins, III". The signature is fluid and cursive, with the first name "E." and last name "Mullins" being more distinct than the middle name "Wade".

E. Wade Mullins, III

Damon E. Xenopoulos, Esquire  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, N.W.  
8<sup>th</sup> Floor, West Tower  
Washington, D.C. 20007

*Counsel to CMC Steel*

EWM/rdd  
Enclosures  
cc: Counsel of Record

PUBLIC VERSION

RECEIVED  
2009 MAR 19 PM 4:01  
SCE&G PUBLIC SERVICE  
SOUTH CAROLINA  
COMMISSION

1 SURREBUTTAL TESTIMONY OF  
2 RICHARD THOMAS  
3 ON BEHALF OF  
4 CMC STEEL SOUTH CAROLINA  
5 DOCKET NO. 2009-2-E  
6 IN RE: ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS  
7 OF SOUTH CAROLINA ELECTRIC & GAS COMPANY

8 INTRODUCTION AND PURPOSE

9 Q. PLEASE STATE YOUR NAME, OCCUPATION, AND ADDRESS.

10 A. My name is Richard Thomas. I operate as an independent consultant. My  
11 address is 26 Cold Spring Road, Monroe, CT 06468.

12 Q. ARE YOU THE SAME RICHARD THOMAS WHO PREVIOUSLY  
13 SPONSORED DIRECT TESTIMONY IN THIS DOCKET ON BEHALF OF  
14 CMC STEEL SOUTH CAROLINA?

15 A. Yes, I am.

16 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

17 A. The purpose of my Surrebuttal Testimony is to respond to the rebuttal testimony  
18 filed by SCE&G's witnesses Forrest Hill, Gerhard Haimberger and John Beier on  
19 the subject of hedging coal costs.

20 [REDACTED]

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14 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

15 A. Yes.

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2009 MAR 19 PM 4: 01

SC PUBLIC SERVICE  
COMMISSION

**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**Docket No. 2009-2-E**

**In RE:** )  
 )  
**Annual Review of Base Rates for Fuel** )  
**Costs of South Carolina Electric and Gas** ) **CERTIFICATE OF SERVICE**  
**Company** )

This is to certify that I have caused to be served this day a copy of the **Surrebuttal**  
**Testimony of Richard Thomas on behalf of CMC Steel South Carolina** via first-class mail,  
postage pre-paid, to the persons named below at the addresses set forth below:


**Nanette S. Edwards**, Counsel  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

**Shannon Bowyer Hudson**, Counsel  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

**K. Chad Burgess**, Senior Counsel  
South Carolina Electric and Gas Company  
1426 Main Street, MC 130  
Columbia, SC 29201

**Belton T. Zeigler**, Esquire  
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P.O. Box 11509  
Columbia, SC 29211

**Mitchell Willoughby**, Esquire  
Willoughby & Hoefer, P.A.  
P.O. Box 8416  
Columbia, SC 29202

  
\_\_\_\_\_  
Rita D. DeCarlis  
Legal Assistant to E. Wade Mullins, III, Esquire  
Bruner, Powell, Robbins, Wall & Mullins, LLC  
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March 19, 2009  
Columbia, South Carolina



ATTORNEYS AND COUNSELORS AT LAW

# BrunerPowell

BRUNER POWELL ROBBINS WALL &amp; MULLINS, LLC

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**FACSIMILE TRANSMITTAL SHEET**

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TO:	Tricia	FROM:	Rita Decarlis
COMPANY:	SC PSC	DATE:	2009-03-20 15:09:07 GMT
FAX NUMBER:	18038965199	TOTAL NO. OF PAGES INCLUDING COVER:	2
SENDER'S EMAIL ADDRESS:	redecarlis@bprwm.com	SENDER'S REFERENCE NUMBER:	
YOUR REFERENCE NUMBER/SUBJECT:	2009-2-E	SENDER'S FAX NUMBER:	18884658015

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**NOTES/COMMENTS:**

Please find attached the revised COS to include Scott Elliott. Thank you.

This communication contains confidential or legally privileged information and is intended only for the use of the individual or entity named above. If you have received this communication in error, please notify us immediately by telephone collect and return the original message to us at the above address via the U.S. Postal Service. We will be glad to reimburse you for postage. Thank you.

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(803) 232-7693

---

**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**Docket No. 2009-2-E**

**In RE:**

**Annual Review of Base Rates for Fuel  
Costs of South Carolina Electric and Gas  
Company**

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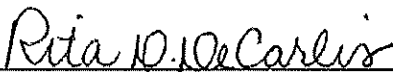
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March 19, 2009  
Columbia, South Carolina